

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

UNITED STATES OF AMERICA :

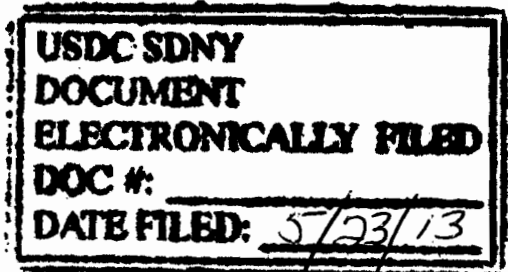
- v. - :

13 Cr. 304 (MGC)

AHMED ABASSI, :

Defendant. :

- - - - - x



PROTECTIVE ORDER PERTAINING TO UNCLASSIFIED INFORMATION

UPON application of the Government, and with consent
of the defense:

WHEREAS, defendant Ahmed Abassi has certain rights
under the United States Constitution, federal statutes, and the
Federal Rules of Criminal Procedure, to pretrial discovery;

WHEREAS, the Government recognizes its obligation to
provide such discovery materials to the defendant, consistent
with national security concerns, the need to protect public
safety, and the confidentiality of ongoing investigations; and

WHEREAS, the volume of discovery materials that the
Government intends to provide to the defendant contains certain
materials that, if disseminated to third parties, could, among
other things, pose a threat to public safety and the national
security and impede ongoing investigations;

IT IS HEREBY ORDERED, pursuant to Federal Rule of Criminal Procedure 16(d), that discovery materials provided by, the Government to counsel of record shall not be further disseminated by the defendant or his counsel to any individuals, organizations or other entities, other than (1) members of the defense team (co-counsel, paralegals, investigators, translators, litigation support personnel, the defendant, and secretarial staff); and (2) defense experts. Each of the individuals to whom disclosure of discovery materials is made shall be provided a copy of this Protective Order by counsel of record and will be advised by counsel of record that he or she shall not further disseminate the materials except by the express direction of counsel of record. In addition, counsel of record for the defendant or any defense investigator may show (but not provide copies of) discovery materials to witnesses or potential witnesses, if it is determined that it is necessary to do so for the purpose of preparing the defense of the case.

IT IS FURTHER ORDERED that all such discovery materials are to be provided to the defense, and used by the defense, solely for the purpose of allowing the defendant to prepare his defense to the charges in the Indictment, and that none of the discovery materials produced by the Government to the defense shall be disseminated to any other third party not described in the preceding paragraphs.

IT IS FURTHER ORDERED that nothing in this Order shall preclude the Government from seeking a further Protective Order pursuant to Section 3 of the Classified Information Procedures Act, 18 U.S.C. App. 3 § 3, to protect against disclosure in this case of any classified information disclosed by the Government.

IT IS FURTHER ORDERED that nothing in this Order prohibits the media from requesting copies of any items that are received by the Court as public exhibits at a hearing, trial, or other proceeding.

FINALLY, IT IS ORDERED that nothing in this Order shall preclude the Government from seeking a further protective order pursuant to Federal Rule of Criminal Procedure 16(d) as to particular items of discovery material.

Dated: New York, New York
May 23, 2013

SO ORDERED:

S/

HONORABLE MIRIAM GOLDMAN CEDARBAUM
United States District Judge
Southern District of New York